

## REMARKS

This application has been reviewed in light of the Office Action dated August 9, 2005. Claims 7, 8, 10, 12 and 13 are pending in this application, of which Claims 7 and 12 are in independent form, and have been amended to define still more clearly what Applicants regard as their invention. Favorable reconsideration is requested.

In the last Office Action, Claims 7, 8, 10, 12 and 13 were rejected solely under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,631,014 B1 (Aoshima).

Independent Claim 7 is directed to an image reading apparatus that comprises a scanning member, movable along an original mounting table, that includes a reading element for reading an original image. A frame member of the image reading apparatus, which has a rib, houses the scanning member. According to Claim 7, the frame member supports the original mounting table on one surface of the frame member, and has the rib provided on a side surface of the frame member and extending from the one surface of the frame member to a surface opposite to the one surface of frame member. A control board is provided for controlling the scanning member, and an interface connector is connected to a signal line of an external apparatus, and is mounted on a side of the control board. Also, according to Claim 7, the control board is secured to the frame member at least at one side on which the interface connector is not mounted, and the control board is secured to the rib of the frame member.

The recitation of the rib is supported by element 81 shown in Figs. 12A and 12B, which show it extending from the one surface of the frame member (at the bottom of those figures) to a opposite surface of the frame member. In the illustrated embodiment,

the rib 81 engages the control board by receiving the latter in a notch or groove in the rib 81.<sup>1</sup>

Among other notable features of Claim 7 is the recited frame member of the image reading apparatus, and the rib of the frame member, with the control board engaging the rib.

While the last Office Action cites a dictionary definition of “rib”, Applicants note that that Office Action does not actually identify any structure shown in *Aoshima* that would meet the cited definition.<sup>2</sup> It is submitted that in fact, nothing in *Aoshima* would teach or suggest such a structure, much less one engaged by element 14, cited in the Office Action as corresponding to the recited control board.

Applicants note the assertion in the Office Action, and the Advisory Action dated December 28, 2005, that it “is inherent for the rib to be held within the frame of *Aoshima*, as the frame is where the control board 14 is secured. The circuit board 15 is attached to the scanning unit 3, which is attached to the guide shaft 4 that is attached to the body frame 1.” Office Action, p. 2. Claim 7 recites that the frame member has a rib, and also recites the location and extent of the rib. The discussion in the Office Action of it allegedly being inherent “for the rib to be held within the frame” begs the question of whether *Aoshima* even has a structure that could be called a rib. It is submitted that nothing

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<sup>1/</sup> It is of course to be understood that the claim scope is not limited by the details of any particular embodiment(s) that may be referred to as examples.

<sup>2/</sup> Applicants do not adopt the Examiner’s chosen definition; nonetheless, for the reasons given in the following portion of these Remarks, it is deemed moot whether that definition is the most apt one.

in *Aoshima* teaches or suggests a rib, and that the terms of Claim 7 are not met by that patent.

For at least these reasons, Claim 7 is believed to be clearly allowable over *Aoshima*.

Independent Claim 12 is directed to an image reading apparatus that comprises a scanning member, movable along an original mounting table, and which includes a reading element for reading an original image and has a frame. This claim also contains the recitations, discussed above, of a control board, and of a rib provided on a frame member, and extending from the surface of the frame member that supports the control board to the opposite surface. Claim 12 also recites that the control board engages the rib.

Applicants strongly believe that *Aoshima* does not in fact show the structure pointed out in Applicants' last-filed Amendment, and believe that this claim is allowable based on that structure.<sup>3</sup> Even assuming such structure actually were taught by *Aoshima*, however, Claim 12 would in any event still be allowable over that patent at least by virtue of the rib and of its recited engagement with the control board.

Accordingly, Claim 12 also is believed to be clearly allowable over *Aoshima*.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a

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<sup>3/</sup> That structure includes the drive source located at a side surface of the frame of the scanning member; the cited portions of *Aoshima* relate to a drive source mounted on the bottom surface.


reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or the other of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

  
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